

MAY 13 2019

Electricity Delivery and
Energy Reliability

UNITED STATES OF AMERICA
BEFORE THE
DEPARTMENT OF ENERGY

Idaho Power Company

Docket No. EA - 445

**APPLICATION OF IDAHO POWER COMPANY
FOR AUTHORIZATION TO TRANSMIT ELECTRIC ENERGY TO CANADA**

Pursuant to Section 202(e) of the Federal Power Act ("FPA") and 10 C.F.R. § 205.300 *et seq.*, Idaho Power Company submits this application for authorization to export wholesale electricity from the United States to Canada for a term of 5 years. In support of this application, Idaho Power states as follows:

INFORMATION REQUIRED PURSUANT TO 10 C.F.R. § 205.302

a. Applicant's Legal Name. The applicant's exact legal name is Idaho Power Company (hereafter "**Idaho Power**").

b. Partners. Idaho Power is not seeking authorization to export power on behalf of, or in conjunction with, any partners.

c. Correspondence. Correspondence regarding this application should be addressed to the following:

Julia Hilton
Senior Counsel
Idaho Power Company
1221 West Idaho Street
Boise, Idaho 83702
208-388-6117
jhilton@idahopower.com

Jaren Wieland
Mooney Wieland PLLC
405 South 8th Street, Suite 295
Boise, Idaho 83702
208-401-9219
jaren.wieland@mooneywieland.com

d. State(s) of Organization and Operation. Idaho Power is incorporated under the laws of Idaho. It is a wholly owned subsidiary of IDACORP, Inc., a holding company incorporated under the laws of Idaho. The principal executive offices for IDACORP and Idaho Power are located at 1221 West Idaho Street, Boise, Idaho 83702. Idaho Power is authorized to operate in Idaho and Oregon.

e. Jurisdiction. Other than the Department of Energy, Idaho Power does not know of any federal, state, or local government agency that may have jurisdiction over the actions proposed in this application. **Description of Transmission Facilities.** Idaho Power requests authorization to export energy over any authorized international transmission facilities appropriate for open-access transmission by third parties in accordance with the export limits authorized by the DOE. Exhibit C to this application identifies the international transmission facilities that are currently authorized by Presidential Permit ("PP") and available for open-access transmission.

g. System Impact. Idaho Power is a regulated electrical power utility engaged in the business of generating, purchasing, transmitting, and distributing electrical energy. Idaho Power generates energy predominately through its hydroelectric projects, thermal plants, and energy it purchases from PURPA projects or other market purchases. The amount of energy generated through hydroelectric projects is variable and dependent on the season, weather, and water conditions. Idaho Power also buys and sells surplus energy pursuant to voluntary bilateral contracts with electric utilities and other suppliers within the United States.

Through this application, Idaho Power requests authorization only to export excess generated or purchased energy that will not impair its ability to meet native load demands, regional load obligations, or prospective wholesale power-supply responsibilities. Further, Idaho Power's exportation of energy will not affect its ability to maintain appropriate reserve levels of energy. Accordingly, Idaho Power's export of power will not impair the sufficiency of the electric power supply in the United States or the reliability of the grid.

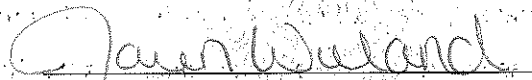
Further, Idaho Power will export excess energy to Canada by making all necessary commercial arrangements, obtaining sufficient transmission capacity to wheel the exported energy to the border system, and coordinating with all parties as required by applicable market rules and the reliability standards implemented by NERC. Idaho Power also agrees to abide by the export limits on any border facility to which it transports the excess energy. Therefore, Idaho Power's export transactions will not compromise the transmission system security or reliability.

h. Verification. See page 4 of this application.

CONCLUSION

In consideration of the foregoing, and pursuant to Exhibits A through F attached hereto in accordance with 10 C.F.R. § 205.303, Idaho Power respectfully requests approval of this application and authorization to export electrical energy into Canada for 5 years.

Respectfully submitted,



Jaren Wieland

Attorney for Idaho Power Company

VERIFICATION

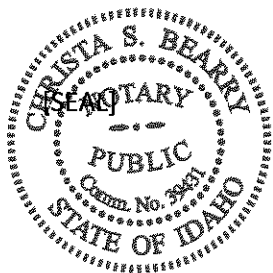
Tessia Park, first being sworn, states that she is Vice President of Power Supply at Idaho Power Company and has authority to verify the foregoing application on Idaho Power Company's behalf, that she has reviewed said application including the exhibits thereto, and that the statements of fact therein are true and correct to the best of her knowledge.

Tessia Park

State of Idaho)

County of Ada)

On this 29th day of April, 2019, before me, a Notary Public for the State of Idaho, personally appeared Tessia Park, who proved to me through satisfactory evidence to be the person named in the foregoing and executed the same.



Christa S. Beatty
Notary Signature
Residing at Meridian, Idaho
My Commission Expires 02/04/2021

EXHIBIT A

A copy of the agreement or proposed agreement under which the electricity is to be transmitted including a listing of the terms and conditions. If this agreement contains proprietary information that should not be released to the general public, the applicant must identify such data and include a statement explaining why proprietary treatment is appropriate.

Not applicable. Idaho Power seeks a blanket approval for exports and export-related agreements to be negotiated and entered into in the future. No particular export transactions are currently under consideration.

EXHIBIT B

A showing, including a signed opinion of counsel, that the proposed export of electricity is within the corporate power of the applicant, and that the applicant has complied or will comply with all pertinent Federal and State laws.

[SEE FOLLOWING PAGE]



MOONEY WIELAND

ATTORNEYS

JAREN WIELAND, PARTNER • T: 208.401.9219 • F: 208.401.9218 • jaren.wieland@mooneywieland.com

Licensed in Idaho

April 28, 2019

United States Department of Energy
Office of Utility Systems and Economic Regulatory Administration
1000 Independence Avenue, SW
Washington, DC 20585

Re: *Application for Authorization to Transmit Electricity to Canada*

To Whom It May Concern:


I am counsel for Idaho Power Company and am authorized to render the following opinions in support of Idaho Power's Application for Authorization to Transmit Electricity to Canada (the "Application") to which this letter is attached. I submit the following opinions pursuant to 10 C.F.R. § 205.303.

The following opinions are based on my review of the Application, my institutional knowledge of Idaho Power and review of relevant corporate records, and my analysis of the laws applicable to the Application. As of the date of the Application, it is my opinion that:

1. Idaho Power has the corporate power and authority to export energy as contemplated in the Application; and
2. To the best of my knowledge and belief, Idaho Power has complied with or will comply with all federal and state laws regarding the matters contemplated in the Application.

This letter and the opinions stated herein are provided only with respect to the transactions contemplated in the Application. Accordingly, it may not be used or relied on for any other purpose without Idaho Power Company's prior written consent.

Sincerely,
Mooney Wieland PLLC


Jaren Wieland

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405 South 8th Street, Suite 295
Boise, Idaho 83702

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American Samoa
PO Box 3501
Pago Pago, AS 96799

EXHIBIT C

A general map showing the applicant's overall electric system and a detailed map highlighting the location of the facilities or the proposed facilities to be used for the generation and transmission of the electric energy to be exported. The detailed map shall identify the location of the proposed border crossing point(s) or power transfer point(s) by Presidential Permit number whenever possible.

Transmission System Information (submitted in lieu of maps)

<u>Present Owner</u>	<u>Location</u>	<u>Voltage</u>	<u>PP No.</u>
Bangor Hydro-Electric Company	Baileyville, ME	345-kV	PP-89
BasinElectricPowerCooperative	Tioga, ND	230-kV	PP-64
Bonneville Power Administration	Blaine, WA	2-500-kV	PP-10
	Nelway, WA	230-kV	PP-36
	Nelway, WA	230-kV	PP-46
Eastern MaineElectricCooperative	Calais,ME	69-kV	PP-32
InternationalTransmission Company	Detroit, MI	230-kV	PP-230
	Marysville, MI	230-kV	PP-230
	St. Claire, MI	230-kV	PP-230
	St. Claire, MI	345-kV	PP-230
ITCLakeErie Connector	Erie County, PA	320-kV	PP-412
Joint Ownersof the Highgate Project	Highgate, VT	120-kV	PP-82
Long Sault, Inc.	Massena, NY	2-115-kV	PP-24
Maine ElectricPower Company	Houlton,ME	345-kV	345-kV

Maine Public Service Company	Limestone, ME	69-kV	PP-12
	Fort Fairfield, ME	69-kV	PP-12
	Madawaska, ME	138-kV	PP-29
	Aroostook, ME	2-69-kV	PP-29
Minnesota Power, Inc.	International Falls, MN	115-kV	PP-78
Minnesota Power, Inc.	Roseau, County, MN	500-kV	PP-398
Minnkota Power Cooperative	Roseau County, MN	230-kV	PP-61
Montana Alberta Tie Ltd.	Cut Bank, MT	230-kV	PP-305
New York Power Authority	Massena, NY	765-kV	PP-56
	Massena, NY	2-230-kV	PP-25
	Niagara Falls, NY	2-245-kV	PP-74
	Devils Hole, NY	230-kV	PP-190
Niagara Mohawk Power Corp.	Devils Hole, NY	230-kV	PP-190
Northern States Power Company	Red River, ND	230-kV	PP-45
	Roseau County, MN	500-kV	PP-63
	MN Rugby, ND	230-kV	PP-231
Sea Breeze Olympic Converter LP	Port Angeles, WA	±450-kVDC	PP-299
Vermont Electric Power Co.	Derby Line, VT	120-kV	PP-66
Vermont Electric Transmission Co.	Norton, VT	±450-kV DC	PP-76

EXHIBIT D

If an applicant resides or has its principal office outside the United States, such applicant shall designate, by irrevocable power of attorney, an agent residing within the United States. A verified copy of such power of attorney shall be furnished with the application.

Not applicable. Idaho Power's principal office is in the United States.

EXHIBIT E

A statement of any corporate relationship or existing contract between the applicant and any other person, corporation, or foreign government, which in any way relates to the control or fixing of rates for the purchase, sale or transmission of electric energy.

Not applicable. Idaho Power has market-based rate authority for the sale of energy, transmission, and ancillary services, which allows it to sell power at market-based rates. Idaho Power's rates for transmission are based upon a historic formula rate set forth in its Power Open-Access Transmission Tariff (OATT).

EXHIBIT F

An explanation of the methodology (Operating Procedures) to inform neighboring electric utilities in the United States of the available capacity and energy which may be in excess of the applicant's requirements before delivery of such capacity to the foreign purchaser. Approved firm export, diversity exchange and emergency exports are exempted from this requirement. Those materials required by this section which have been filed previously with the ERA may be incorporated by reference.

Idaho Power does not have specific written operating procedures it uses to inform neighboring utilities of available capacity and energy. Consistent with energy trading practices in the region, Idaho Power's trades through the Inter-Continental Exchange (ICE) or the Intra-Hour Transaction Accelerator Platform ("I-TAP"), which allows entities to post, view, and bid upon any available energy and/or capacity. Also consistent with practices in the region, Idaho Power has longstanding relationships with regional utilities and marketing companies and notifies them by telephone when it has available energy and/or capacity. Idaho Power also complies with all FERC, NERC, and WECC reliability requirements.